



Union Special LLC
One Union Special Plaza
Huntley, Illinois 60142-7007
Phone: (847) 669-5101
Fax: (847) 669-4425

January 25, 2012

RECEIVED JAN 30 2012 *gcl*

Deena Sheppard
Enforcement Specialist
U.S. Environmental Protection Agency – Region 5
Superfund Division (SC-5J)
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Request for Information – Gary Development Landfill Site

Dear Ms. Sheppard:

This is in response to your inquiry dated November 30, 2011.

Union Special Corporation ("USC") (EIN 36-1893860), a Delaware corporation, was dissolved on September 11, 2008. Union Special, LLC ("USL") (EIN 26-2167565), an Illinois limited liability company, owned 100% of the issued and outstanding shares of Union Special Corporation. The shares were purchased on February 29, 2009 from JUKI Corporation. Pursuant to the dissolution of USC, USC assets were transferred to USL as of January 1, 2009. USL has been and continues to be a good and cooperative business citizen with respect to following and adhering to all environmental laws.

We have reviewed all available archived records and documentation of USC and have been unable to find any reference to the Gary Development Landfill site. Based on our review we have also determined that we will not be able to complete a substantial part of your inquiry.

In our review of records we were able to find that USC was party to an EPA investigation of a site referred to as Lenz Oil. The investigation was started by the EPA in 1995. Attached to this letter is an initial response letter sent by an officer of USC at the time. The letter alludes to the fact that USC had little success, even then, providing archived records from the 1970's and 80's.

Please call or email me to discuss how USL should further pursue this matter.

Sincerely,

Terence A Hitpas
President
Union Special, LLC

847-669-4501
thitpas@unionspecial.com



100-443886-10

UNION SPECIAL CORPORATION

ONE UNION SPECIAL PLAZA

HUNTLEY, IL. 60142

(708) 669-4553

09/21/95

U.S. Environmental Protection Agency
P.O. Box 06139
Wacker Drive Post Office
Sears Tower
Chicago IL 60606 - 0139

Re: Request for Information - Lenz Oil Service, Inc.

Gentlemen:

The following is in response to your request dated May 19, 1995 regarding Lenz Oil. I apologize for the delay in getting this response to you, but we did a pretty thorough investigation of our records to make sure that we complied with your request to the best of our ability. Our ability to produce past records is somewhat limited by the fact that the general offices of the corporation have been moved twice in the past seven years, from 400 N. Franklin to 222 N LaSalle Street in Chicago and from there to Huntley, Illinois. A lot of historical records were lost in the course of these two moves.

RESPONSE TO YOUR INFORMATION REQUESTS:

1. Persons consulted in the preparation of the answers to these Information Requests were:

Mr. Paul Hoffe - Vice President - Operations
Mr. Tony Brasile - Director, - Manufacturing Services
Mr. Leland Brasile - Director - Contract Manufacturing
Mr William Montanye - Manager - Maintenance
Mr. William Schepler - Facility Engineer
Mr. Frank Wilson - Traffic Manager
Mr. Harry Christensen - Retired - former plant maintenance supervisor
Mr. Thomas Krakowiak - Corporate Controller

2. Of all of the persons listed above the only individual that had a file, or any written records of any sort, regarding any of our dealing with Lenz Oil, was Mr. William Montanye. While Mr. Montanye never had any direct dealings with Lenz Oil (we had

ceased dealing with Lenz long before Mr. Montanye became manager of the Maintenance Department). That file, with few exceptions, contains only correspondence between ourselves and the law firms of Katten, Muchin & Zavis, and Sidley & Austin. The other items in the file consist of (a) a letter, dated Oct. 27, 1987 from Gabriel Environmental & Energy Services giving a chemical analysis of the waste oil taken from our plant by Lenz, (b) a hand written note that identifies certain quantities of some liquid (not identified) shipped somewhere (not identified), (c) an internal memo dated Dec. 14, 1987, and (d) a copy of a receipt provided by the Ill. EPA and obtained from Lenz Oil (I assume it was receipts such as these that were found at Lenz Oil that were used to establish quantities of liquids received from shippers such as ourselves.

3. I have no reason to believe that there are any other persons who could provide a more complete response to the Information Request.

4. Federal - IDL 005104757
Illinois - 1110355001

5. Union Special is a manufacturer of industrial sewing machines. Essentially, it is a machine shop and we use lubricating oils in our manufacturing processes. Prior to 1986 these waste materials were hauled away from our facilities by various contractors, including Lenz Oil. We did not treat, dispose of or transport these materials ourselves. Obviously, we would have handled these oils inside our own plant.

6. We are not aware of any person who was not our employees, contractors or agents, that may have caused the release or the threat of release of hazardous substances, pollutants, or contaminants, and damages resulting therefrom.

7. Our arrangement with Lenz Oil goes so far back that there is no one here that can remember with whom arrangements were made for disposal or treatment, or transportation for disposal or treatment, of waste materials, including hazardous substances, at the Site. Essentially there are no persons or records here at Union Special that would identify any individuals that were dealt with, the time, date or place where such arrangements took place, the specific nature of the waste material shipped or its chemical content other than the letter from Gabriel referred to in item #2 above.

7 (a). unknown

7 (b). unknown

7 (c). unknown, except that to the best of our knowledge Lenz Oil only took "waste oil".

7 (d). Union Special Corporation

7 (e). unknown

7(f). See letter from Gabriel (10/6/87), enclosed herein

7 (g). unknown

7 (h). The amount paid is unknown. I assume the method of payment was by check, because that is how we pay all of our bills.

7 (i). unknown

7 (j) unknown

7 (k) unknown

7.(l) unknown

7(m) unknown

7 (n) The waste material was apparently contained in 55 gallon drums. Any markings on those drums is unknown .

8. We have not had a great deal of success in locating old liability insurance policies that we have had since 1975. With the exception of 1986 we have located policies covering the year 1985 through the current year. We have found nothing prior to 1985. Copies of the policies that we have located are enclosed with this letter and a summary appears in Exhibit A.

9. Federal income tax returns for the years 1990, 1991 and 1992 are enclosed. We have not filed tax returns since 1992 because our losses have been so large it really doesn't make much difference.

10. a) The Articles of Incorporation and the By-Laws are enclosed.

b) Consolidated financial statements for the past five years are enclosed.

c) Current assets and current liabilities at December 31, 1994 are as indicated in the enclosed consolidated balance sheet for that date. The Vice President and Chief Financial Officer of the Corporation is Terrence Hitpas, and the Treasurer of the Corporation is Robert Schwartz.

d) Union Special's parent company is JUKI Corporation of Tokyo, Japan . A listing of our subsidiaries is enclosed.

11 . not applicable

12. not applicable

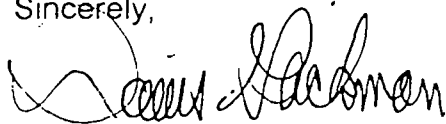
Financial Note:

A summary of our consolidated losses for the past five years is as follows:

	<u>Loss</u>
1994	\$ 7,499,000
1993	\$23,545,000
1992	\$12,449,000
1991	\$22,427,000
1990	<u>\$21,914,000</u>
Cumulative five year loss	<u>\$87,834,000</u>

We have not had a positive cash flow since 1986. The cumulative negative operating cash in the years 1987 through the first half of 1995 is \$95,721,897. The company has been kept alive by cash infusions from its parent company and increased borrowing. The point of providing this financial information is to demonstrate that the Company is in no position to participate in any clean-up costs at the Lenz Oil site.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Glickman". The signature is fluid and cursive, with a large initial "L" and "G".

Union Special Corporation
Louis Glickman

UNION SPECIAL CORPORATION
LIABILITY INSURANCE POLICIES

Exhibit A

<u>Insurance Company</u>	<u>Type of Coverage</u>	<u>For The Year Beginning</u>	<u>Does It Contain a Pollution Exclusion</u>
1 American Global	Commercial Gen Liability	6/1/95	yes
2 Chubb	Commercial Umbrella	6/1/95	yes
3 Yasuda Fire & Marine	Commercial Gen Liability	5/1/94	yes
4 Fireman's Fund	Umbrella and Excess Liab	6/1/94	?
5 Transamerica	Excess Umbrella	5/1/93	yes
6 Yasuda Fire & Marine	Commercial Gen Liability	5/1/93	yes
7 Yasuda Fire & Marine	Commercial Umbrella	5/1/93	yes
8 Yasuda Fire & Marine	Commercial Gen Liability	5/1/92	?
9 Yasuda Fire & Marine	Commercial Umbrella	5/1/92	?
10 Fireman's Fund	Excess Liability	5/1/92	yes
11 Yasuda Fire & Marine	Commercial Gen Liability	5/1/91	yes
12 Yasuda Fire & Marine	Commercial Excess Umbrella	5/1/91	yes
13 Chubb	Commercial Gen Liability	5/1/90	yes
14 Sumitomo Marine & Fire	Commercial Excess Umbrella	5/1/90	yes
15 International Ins. Co.	Excess	5/1/90	yes
16 Firemans fund	Excess Liability	5/1/90	yes
17 Liberty Mutual	Commercial Gen Liability	5/1/88	yes
18 Liberty Mutual	Umbrella Excess Liab	5/1/88	yes
19 Liberty Mutual	Comprehensive Gen Liability	5/1/87	yes
20 Liberty Mutual	Umbrella Excess Liab	5/1/87	yes
21 United National Ins. Co.	Comprehensive Gen Liability	5/1/85	yes
22 U.S. Insurance Group	Commercial Umbrella	5/1/85	yes
23 Central Natl Ins. Co.	Excess Liability	5/1/85	yes

CERTIFIED MAIL



Union Special ~~Corporation~~
One Union Special Plaza
Huntley, IL 60142



7002 1000 0005 3249 1356



0000003268



**RETURN RECEIPT
REQUESTED**

Deena Sheppard
Enforcement Specialist
U.S. Environmental Protection Agency - Region 5
Superfund Division (SC-5J)
77 West Jackson Boulevard
Chicago, IL 60604-3590

6060435608 0005



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
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